

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

FREE THE NIPPLE – SPRINGFIELD )  
RESIDENTS PROMOTING EQUALITY, )  
et al., )  
                                  )  
Plaintiffs, )                            Case No. 6:15CV3467-BP  
                                  )  
v. )  
                                  )  
CITY OF SPRINGFIELD, MISSOURI, )  
                                  )  
Defendant. )

**Consent Motion to Amend Case Management Order**

Come now Plaintiffs with the consent of Defendant and move this court to modify the case management order to extend the deadline for Plaintiff to disclose experts and provide expert reports from October 14, 2016, to November 18, 2016. In support, Plaintiffs state:

1. Under the current scheduling order, plaintiffs “shall designate any expert witnesses [they] intend[] to call at trial on or before October 14, 2016[.]” ECF No. 27.
2. The parties have engaged in written discovery. Because of the large number of documents Defendant had to sort through to respond to Plaintiffs’ requests, additional time was needed. Moreover, because of the large number of documents produced, it is taking longer than originally anticipated for Plaintiffs’ counsel to review the records.
3. For this reason as well as scheduling issues with a prospective expert, Plaintiffs request that the time for disclosure of their experts be extended to November 18, 2016.
4. The requested extension will not require any other changes to the scheduling order.
5. Defendant consents to this request.

WHEREFORE Plaintiffs request this Court extend the time for them to designate experts through November 18, 2016.

Respectfully submitted,

/s/ Anthony E. Rothert  
Anthony E. Rothert, #44827  
Jessie Steffan, #64861  
ACLU of Missouri Foundation  
454 Whittier Street  
St. Louis, Missouri 63108  
Phone: 314-669-3420  
Fax: 314-652-3112  
[rothert@aclu-mo.org](mailto:rothert@aclu-mo.org)  
[jsteffan@aclu-mo.org](mailto:jsteffan@aclu-mo.org)

Gillian R. Wilcox, #61278  
ACLU of Missouri Foundation  
406 West 34th Street, Ste. 420  
Kansas City, Missouri 64111  
Phone: 816-470-9938  
Fax: 314-652-3112  
[gwilcox@aclu-mo.org](mailto:gwilcox@aclu-mo.org)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 17, 2016, I filed the foregoing with the Clerk of the Court using the CM/ECF system, and a copy was made available to all electronic filing participants.

/s/ Anthony E. Rothert